

**Exhibit 261** [replacing Dkt. #1964-48] attached to Plaintiffs' Memorandum of Law in Support of Motion for Partial Summary Adjudication that Defendants did not Comply with Their Duties under the Federal Controlled Substances Act to Report Suspicious Opioid Orders and Not Ship Them (Second Corrected) at Dkt. #1910-1.

**Exhibit 124** [replacing Dkt. #2427-4] attached to Plaintiffs' Consolidated Memorandum in Opposition to Defendants' Motions for Summary Judgment on Proof of Causation (Corrected) at Dkt. #2204.

- Redactions withdrawn by Defendant

## RE: Threshold Change Requests

From:

"Gustin, Dave" &lt;dave.gustin@mckesson.com&gt;

To:

"Russell, Bruce" <bruce.russell@mckesson.com>, "de Gutierrez-Mahoney, Bill" <bill.mahoney@mckesson.com>, "Hilliard, Gary" <gary.hilliard@mckesson.com>, "Jonas, Tracy" <tracy.jonas@mckesson.com>, "McDonald, Tom" <tom.mcdonald@mckesson.com>, "Oriente, Michael" <michael.oriante@mckesson.com>

Date:

Fri, 27 Jul 2012 15:11:11 +0000

May I suggest naming someone to channel it through so we don't have things being shared that may not be agreed upon by the rest of the team. (unlike the below which is something we all agree upon) In the same manner in which I am channeling for the RNA, for example.  
*"You cannot help men permanently by doing for them what they could and should do for themselves."*

-Abraham Lincoln

Dave Gustin DRA North Central  
 937 840 8553

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**From:** Russell, Bruce**Sent:** Friday, July 27, 2012 11:06 AM**To:** de Gutierrez-Mahoney, Bill; Gustin, Dave; Hilliard, Gary; Jonas, Tracy; McDonald, Tom; Oriente, Michael**Cc:** Bell, Melinda**Subject:** Threshold Change Requests

All, as we move forward with transitioning support to our ServiceFirst extended team, let's make sure we "transfer knowledge" too. Below is excellent example...

**From:** McDonald, Tom**Sent:** Friday, July 27, 2012 8:18 AM**Cc:** #PGRDRC**Subject:** Threshold Change Requests

West,

I have noticed a trend with TCRs that needs to be addressed. The information submitted on the TCR is extremely important to our documentation process. When I screen the TCR I'm assuming some steps have been completed. First and foremost is direct contact with the customer. This contact is required. Be sure you are noting who you spoke with when completing the documentation portion. Ask for a specific reason for the increase in usage. Business growth should be accompanied by specific examples of what is generating that growth. For instance, a competitor, Tom's Drug, went out of business and was located in the area. Another example is a new doctor, Dr. McDonald, DEA #XX1234567 is in the building and writing a high volume of oxycodone scripts. General terms like 'business growth' or 'customer hit their threshold' are not acceptable. Please be as specific as you can in that documentation field. Many of you do this very well. I appreciate your attention to detail. Thank you and forward questions.

Regards,

Tom McDonald  
 Director of Regulatory Affairs  
 Western Region  
 McKesson Pharmaceuticals  
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 Santa Fe Springs, CA 90670  
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